

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
SOUTHERN DIVISION**

BRENT NIX, individually and on behalf of all
others similarly situated,
Plaintiff,
v.

Civil Action No. 7:17-CV-00189-D

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. du PONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION,
ELLIS H. MCGAUGHY, and MICHAEL E.
JOHNSON,

Defendants.

ROGER MORTON, individually and on behalf
of all others similarly situated,
Plaintiff,
v.

Civil Action No. 7:17-cv-00197-D

THE CHEMOURS COMPANY FC, LLC, THE
CHEMOURS COMPANY, E.I. du PONT de
NEMOURS AND COMPANY, INC., E.I.
DUPONT CHEMICAL CORPORATION,
ELLIS H. MCGAUGHY, AND MICHAEL E.
JOHNSON;

Defendants.

VICTORIA CAREY, MARIE BURRIS,
MICHAEL KISER, and BRENT NIX,
individually and on behalf of all others similarly
situated,
Plaintiffs,

v.

Civil Action No. 7:17-CV-00201-D

E.I. du PONT de NEMOURS AND COMPANY
and THE CHEMOURS COMPANY FC, LLC,

Defendants.

PROPOSED SCHEDULE

Pursuant to the Court's October 4, 2023 Order [D.E. 420], the Parties propose the following schedule for future proceedings in this matter:

1. Fact Discovery: January 1 - March 15, 2024
2. Expert Discovery: March 16 - May 31, 2024
 - a. Plaintiffs' Disclosures and Depositions Completed: April 26, 2024
 - b. Defendants' Disclosures and Depositions Completed: May 31, 2024
3. Dispositive Motions (including Motions for Summary Judgment) and Rule 702 Challenges: July 12, 2024
4. Responses to Dispositive Motions and Rule 702 Challenges: August 9, 2024
5. Replies in Support of Dispositive Motions and Rule 702 Challenges: August 30, 2024
6. Parties to be ready for trial:
 - a. *Plaintiffs' Proposal*: December 2, 2024
 - At least 45 days after the time for discovery has expired a final pretrial conference shall be scheduled
 - 28 days before the pretrial conference the Parties must provide to all other parties the pretrial disclosures required under Fed. R. Civ. P. 26(a)(3)
 - 21 days before the pretrial conference the Parties may designate and serve any objections listed in Fed. R. Civ. P. 26(a)(3)
 - 7 days before the pretrial conference the pretrial order must be submitted to the Court
 - b. *Defendants' Proposal*: Ninety days after the Court's ruling on Dispositive Motions and Rule 702 Challenges

Dated: November 1, 2023

Respectfully submitted,

/s/ Thomas H. Segars

Kenneth J. Reilly (*admitted pro hac vice*)

SHOOK, HARDY AND BACON, LLP

201 S. Biscayne Blvd

3200 Citigroup Center

Miami, FL 33131

Phone: 305-358-5171

Fax: 305-358-7470

kreilly@shb.com

Joshua Becker (*admitted pro hac vice*)

SHOOK, HARDY AND BACON L.L.P.

1230 Peachtree Street, Suite 1200

Atlanta, GA 30309

Phone: 470-867-6000

Fax: 470-867-6001

jbecker@shb.com

Britta N. Todd (*admitted pro hac vice*)

SHOOK, HARDY AND BACON L.L.P.

2555 Grand Blvd.

Kansas City, MO 64108

Phone: 816-559-2487

Fax: 816-421-5547

btodd@shb.com

Thomas H. Segars

N.C. State Bar No. 29433

ELLIS & WINTERS LLP

P.O. Box 33550

Raleigh, NC 27636

Phone: 919-865-7000

Fax: 919-865-7010

tom.segars@elliswinters.com

Attorneys for Defendants

/s/ Theodore J. Leopold

Theodore J. Leopold
Leslie M. Kroeger
**COHEN MILSTEIN SELLERS
& TOLL PLLC**
2925 PGA Boulevard, Ste. 220
Palm Beach Gardens, FL 33410
(561) 515-1400 Telephone
(561) 515-1401 Facsimile
tleopold@cohenmilstein.com

Jay Chaudhuri
N.C. Bar No. 27747
**COHEN MILSTEIN SELLERS
& TOLL PLLC**
407 N. Person St.
Raleigh, NC 27612
(919) 890-0560 Telephone
(919) 890-0567 Facsimile
jchaudhuri@cohenmilstein.com

Gary W. Jackson
N.C. Bar No. 13976
**THE LAW OFFICES OF JAMES
SCOTT FARRIN, P.C.**
280 S. Mangum St., Ste. 400
Durham, NC 27701
(919) 688-4991 Telephone
(800) 716-7881 Facsimile
gjackson@farrin.com

Stephen Morrissey
Jordan Connors
Steven Seigel
SUSMAN GODFREY, L.L.P.
401 Union Street, Ste. 3000
Seattle, WA 98101
(206) 516-3880 Telephone
(206) 516-3883 Facsimile
smorrissey@susmangodfrey.com
jconnors@susmangodfrey.com
sseigel@susmangodfrey.com

Andrew Whiteman
N.C. Bar No. 9523
WHITEMAN LAW FIRM
5400 Glenwood Ave., Ste. 225
Raleigh, NC 27612
(919) 571-8300 Telephone
(919) 571-1004 Facsimile
aow@whiteman-law.com

Neal H. Weinfield
THE DEDENDUM GROUP
1956 Cloverdale Ave.
Highland Park, IL 60035
(312) 613-0800 Telephone
(847) 478-0800 Facsimile
nhw@dedendumgroup.com

S. Douglas Bunch
Alison Deich
**COHEN MILSTEIN SELLERS
& TOLL PLLC**
1100 New York Ave., N.W., Ste. 500
Washington, D.C. 20005
(202) 408-4600 Telephone
(202) 408-4699 Facsimile
dbunch@cohenmilstein.com
adeich@cohenmilstein.com

Vineet Bhatia
SUSMAN GODFREY, L.L.P.
1000 Louisiana St., Ste. 5100
Houston, TX 77002
(713) 651-3666 Telephone
(713) 654-6666 Facsimile
vbhatia@susmangodfrey.com

Attorneys for Plaintiffs and the Class